## **EXHIBIT A**

# Burns | Bair

10 E. Doty St., Suite 600 Madison, Wisconsin 53703-3392 608-286-2302 www.BurnsBair.com

The Bishop of Oakland UCC

**Issue Date:** 10/11/2023

**Bill #:** 01243

Matter: Insurance

#### **PROFESSIONAL SERVICES RENDERED**

#### **Committee Meetings**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
9/6/2023	Jesse Bair	Review agenda for upcoming state court counsel meeting (.1);	0.10	\$90.00
9/7/2023	Jesse Bair	Participate in state court counsel meeting for insurance purposes re case status, strategy, and mediation issues (.8);	0.80	\$720.00
9/8/2023	Jesse Bair	Prepare for Committee meeting (.1);	0.10	\$90.00
9/8/2023	Jesse Bair	Participate in Committee meeting for insurance purposes re case status and strategy (1.1);	1.10	\$990.00
9/14/2023	B Timothy Burns	Participate in state court counsel meeting for insurance purposes re mediator selection and related case issues (1.2);	1.20	\$1,344.00
9/14/2023	B Timothy Burns	Prepare for state court counsel meeting (.3);	0.30	\$336.00
9/14/2023	3 Timothy Burns	Analysis regarding insurance action items following state court counsel meeting (.2);	0.20	\$224.00
9/20/2023	3 Timothy Burns	Review materials regarding potential mediators in preparation for state court counsel meeting (.1); review related correspondence with state court counsel and Lowenstein re same (.1);	0.20	\$224.00
9/20/2023	B Jesse Bair	Review agenda for upcoming state court counsel meeting (.1);	0.10	\$90.00
9/21/2023	3 Timothy Burns	Participate in weekly state court counsel meeting for insurance purposes (.6);	0.60	\$672.00
9/21/2023	3 Timothy Burns	Prepare summary of state court counsel meeting (.2);	0.20	\$224.00
9/22/2023	3 Jesse Bair	Participate in Committee meeting for insurance purposes (.9);	0.90	\$810.00
		<b>Totals for Committee Meetings</b>	5.80	\$5,814.00

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#### **Fee Applications**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
9/18/2023	Jesse Bair	Participate in call with G. Albert re Committee interim fee applications (.1);	0.10	\$90.00
9/18/2023	Brenda Horn-Edwards	Draft BB monthly professional fee statement (.4); generate and edit Exhibit A to same (.1);	0.50	\$170.00
9/24/2023	Jesse Bair	Review and edit Burns Bair invoice for inclusion as exhibit in monthly fee submission (.8);	0.80	\$720.00
9/25/2023	Jesse Bair	Review and edit Burns Bair monthly fee application (.2); correspondence with G. Albert re same (.1);	0.30	\$270.00
		Totals for Fee Applications	1.70	\$1,250.00

#### Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
9/6/2023	Jesse Bair	Participate in insurance status hearing (1.5);	1.50	\$1,350.00
9/26/2023	Jesse Bair	Participate in portion of case status conference and hearing on the insurers' Rule 2004 motion (1.8);	1.80	\$1,620.00
9/26/2023	Timothy Burns	Attend portion of case status conference and hearing on the insurers' Rule 2004 motion (1.8);	1.80	\$2,016.00
		Totals for Hearings	5.10	\$4,986.00

### **Insurance Adversary Proceeding**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
9/1/2023	Timothy Burns	Conference with J. Bair re case insurance developments and ongoing projects (.4);	0.40	\$448.00
9/1/2023	Jesse Bair	Correspondence with M. Kaplan re the insurers' motion to dismiss and Rule 2004 motion (.1);	0.10	\$90.00
9/1/2023	Jesse Bair	Conference with T. Burns re case insurance developments and ongoing projects (.4);	0.40	\$360.00
9/1/2023	Jesse Bair	Correspondence with B. Weisenberg and G. Albert re finalization of the Committee insurance intervention order (.2):	0.20	\$180.00
9/1/2023	Jesse Bair	Correspondence with B. Weisenberg re upcoming insurance status conference (.1); correspondence with the Debtor re same (.1);	0.20	\$180.00
9/2/2023	Jesse Bair	Begin preparing for insurance status hearing (.1);	0.10	\$90.00
9/2/2023	Timothy Burns	Review Debtor's preliminary response re the insurers' Rule 2004 motion and the Committee's joinder re same (.2);	0.20	\$224.00

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9/2/2023	Jesse Bair	Review preliminary order re the insurers'	0.10	\$90.00
9/2/2023	Timothy Burns	2004 motion (.1):  Correspondence with Lowenstein team re the insurers' objection to the Committee's draft intervention order (.2);	0.20	\$224.00
9/2/2023	Jesse Bair	Brief review of the insurers' motions to dismiss papers (.1);	0.10	\$90.00
9/2/2023	Jesse Bair	Analyze the insurers' objection to the Committee's intervention order (.3);	0.30	\$270.00
9/2/2023	Timothy Burns	Review the insurers' Objection to the Committee's draft intervention order (.2);	0.20	\$224.00
9/4/2023	Jesse Bair	Review certain excess insurers' motion to dismiss the insurance adversary complaint (.4);	0.40	\$360.00
9/4/2023	Timothy Burns	Review the insurers' San Francisco DJ complaint in connection with the insurers' motion to dismiss the Oakland adversary proceeding (.2):	0.20	\$224.00
9/4/2023	Timothy Burns	Review the insurers' Rule 2004 exam papers (.3);	0.30	\$336.00
9/4/2023	Jesse Bair	Review Pacific Indemnity's motion to dismiss the insurance adversary complaint (.3);	0.30	\$270.00
9/4/2023	Jesse Bair	Review Travelers' answer and affirmative defenses (.2);	0.20	\$180.00
9/4/2023	Jesse Bair	Review the insurers' Rule 2004 motion (.4);	0.40	\$360.00
9/4/2023	Timothy Burns	Review Pacific's motion to dismiss and motion for more definite state (.3);	0.30	\$336.00
9/4/2023	Jesse Bair	Review the Debtor's preliminary response to the insures' Rule 2004 motion (.1); review the Committee's joinder re same (.1);	0.20	\$180.00
9/4/2023	Timothy Burns	Reviewed certain insurers' motion to dismiss (.2);	0.20	\$224.00
9/5/2023	Jesse Bair	Provide instructions to B. Cawley re research needed in connection with insurance discovery issue (.1);	0.10	\$90.00
9/5/2023	Brian Cawley	Email J. Bair regarding claims file research project (.1);	0.10	\$55.00
9/5/2023	Jesse Bair	Draft response to the insurers' objection to the Committee's intervention order (1.9);	1.90	\$1,710.00
9/5/2023	Jesse Bair	Review correspondence with the Debtor re the insurers' Rule 2004 motion (.1);	0.10	\$90.00
9/5/2023	Brian Cawley	Create exhibits for Bair declaration in response to the insurers' objection to the Committee's draft intervention order (.3);	0.30	\$165.00
9/5/2023	Jesse Bair	Participate in insurance strategy meeting with Lowenstein team re insurer motion to dismiss, 2004 motion, and intervention order objection (.7);	0.70	\$630.00

9/5/2023	Jesse Bair	Draft revised proposed Order approving the Committee's intervention in the insurance adversary proceeding (.2);	0.20	\$180.00
9/5/2023	Jesse Bair	Participate in meeting with the Diocese and Lowenstein re case insurance issues (.7);	0.70	\$630.00
9/5/2023	Jesse Bair	Prepare for meeting with the Diocese re case insurance issues (.1);	0.10	\$90.00
9/5/2023	Jesse Bair	Prepare for insurance strategy meeting with the Lowenstein team (.1);	0.10	\$90.00
9/5/2023	Jesse Bair	Preliminary review re declaratory judgment action filed by certain insurers against the Archbishop of San Francisco in relation to arguments made by certain insures in this case to dismiss the Diocese's insurance complaint (.2); correspondence with the Diocese re same (.1):	0.30	\$270.00
9/5/2023	Jesse Bair	Draft Bair declaration and related exhibits in support of the Committee's response to the insurers' objection to the Committee's intervention order (.2);	0.20	\$180.00
9/5/2023	Jesse Bair	Research and analyze case law in connection with the insurers' objection to the Committee's intervention order (.3);	0.30	\$270.00
9/6/2023	Timothy Burns	Correspondence with J. Bair re insurance status hearing and hearing on Committee intervention order (.2);	0.20	\$224.00
9/6/2023	Jesse Bair	Prepare for insurance status hearing (.4);	0.40	\$360.00
9/6/2023	Timothy Burns	Review correspondence with J. Bair and the Debtor re the insurers' document productions (.1);	0.10	\$112.00
9/6/2023	Timothy Burns	Review Committee intervention order (.1);	0.10	\$112.00
9/6/2023	Jesse Bair	Correspondence with T. Burns re outcome of insurance status hearing (.1);	0.10	\$90.00
9/6/2023	Brian Cawley	Research discoverability of claims files under California law (3.7);	3.70	\$2,035.00
9/6/2023	Jesse Bair	Review the insurers' reply to the Debtor's response to the insurers' Rule 2004 motion (.1);	0.10	\$90.00
9/6/2023	Timothy Burns	Correspondence with J. Bair re state court counsel meeting re case mediation issues (.1);	0.10	\$112.00
9/6/2023	Jesse Bair	Correspondence with the Debtor re the insurers' recent policy document productions (.1);	0.10	\$90.00
9/6/2023	Jesse Bair	Prepare final Word version of Committee insurance intervention order (.1);	0.10	\$90.00
9/7/2023	Jesse Bair	Correspondence with B. Weisenberg and M. Kaplan re the insurers' Rule 2004 motion (.1);	0.10	\$90.00
9/7/2023	Brian Cawley	Continue researching the discoverability of claim files under California law (1.9);	1.90	\$1,045.00

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9/8/2023 Jesse Bair	Review correspondence with the Debtor and the insurers re Rule 2004 meet and confer and adversary proceeding Rule 26 conference (.2);	0.20	\$180.00
9/8/2023 Brian Cawley	Finish researching the discoverability of claim files under California law and draft memorandum summarizing research results for J. Bair (3.1);	3.10	\$1,705.00
9/8/2023 Jesse Bair	Review insurer letter to the Diocese re requested documents (.1);	0.10	\$90.00
9/8/2023 Alyssa Turgeon	Additional analysis of Diocesan coverage correspondence and continue drafting detailed spreadsheet summarizing same (4.0);	4.00	\$1,360.00
9/10/2023 Jesse Bair	Correspondence with the Diocese re the Diocese's proposed insurance adversary proceeding protective order and the Committee's suggested edits to same (.1);	0.10	\$90.00
9/10/2023 Jesse Bair	Review and edit the Diocese's proposed insurance adversary proceeding protective order (.8);	0.80	\$720.00
9/12/2023 Jesse Bair	Correspondence with the Debtor re case insurance materials and recent insurer document production (.1);	0.10	\$90.00
9/12/2023 Timothy Burns	Review correspondence from the Debtor re insurance adversary proceeding protective order (.1);	0.10	\$112.00
9/12/2023 Timothy Burns	Review T. Schiavoni correspondence re insurance protective order (.1);	0.10	\$112.00
9/13/2023 Jesse Bair	Review the debtor's proposed adversary proceeding schedule (.1); correspondence with M. Kaplan and T. Burns re same and potential revisions (.2); correspondence with the debtor re same (.1);	0.40	\$360.00
9/13/2023 Timothy Burns	Participate in call with J. Bair re insurance strategy and next-steps (.2);	0.20	\$224.00
9/13/2023 Alyssa Turgeon	Additional analysis of Diocesan coverage correspondence and continue drafting detailed spreadsheet summarizing same (5.5);	5.50	\$1,870.00
9/13/2023 Jesse Bair	Review correspondence with the debtor and the insurers re proposed adversary proceeding protective order (.1);	0.10	\$90.00
9/13/2023 Jesse Bair	Participate in call with T. Burns re insurance strategy and next-steps (.2);	0.20	\$180.00
9/14/2023 Timothy Burns	Review correspondence with Lowenstein and state court counsel re mediation issues (.2);	0.20	\$224.00
9/14/2023 Jesse Bair	Review correspondence with Lowenstein and state court counsel re potential mediators (.1);	0.10	\$90.00

9/14/2023 Jesse Bair	Review B. Weisenberg correspondence re retention of valuation expert and case update (.1);	0.10	\$90.00
9/14/2023 Timothy Burns	Consideration concerning and email to J. Bair re ongoing case insurance projects (.1);	0.10	\$112.00
9/14/2023 Jesse Bair	Correspondence with the Diocese re insurance document production status (.1);	0.10	\$90.00
9/14/2023 Timothy Burns	Review correspondence with Lowenstein, the Committee, and state court counsel re committee meeting and ongoing projects (.1);	0.10	\$112.00
9/14/2023 Jesse Bair	Review the Debtor's limited objection to the insurers' 2004 motion (.3);	0.30	\$270.00
9/14/2023 Jesse Bair	Review the Committee's objection to the insurers' 2004 motion (.2);	0.20	\$180.00
9/14/2023 Jesse Bair	Participate in meet and confer with the Diocese and the insurers re the insurers' Rule 2004 motion (1.0);	1.00	\$900.00
9/15/2023 Timothy Burns	Review and consider issues pertaining to stipulation re Rule 2004 motion (.2);	0.20	\$224.00
9/15/2023 Jesse Bair	Leave voice-message for Debtor insurance counsel re Diocesan coverage materials (.1);	0.10	\$90.00
9/15/2023 Timothy Burns	Review the Diocese's limited objection to the insurers' Rule 2004 request (.4);	0.40	\$448.00
9/15/2023 Timothy Burns	Review and consider transcript of 9/6 insurance hearing (.7);	0.70	\$784.00
9/15/2023 Jesse Bair	Participate in call with B. Weisenberg re Claro retention and insurance allocation work (.2);	0.20	\$180.00
9/17/2023 Timothy Burns	Review new California law on time-limited demands (.5);	0.50	\$560.00
9/18/2023 Jesse Bair	Analysis re current version of Diocesan coverage chart (.1); correspondence with BB team re follow-up question in connection with same (.1);	0.20	\$180.00
9/18/2023 Brian Cawley	Analyze insurance materials for response to J. Bair question regarding SIRs and aggregates (.4);	0.40	\$220.00
9/18/2023 Jesse Bair	Participate in conference with T. Burns re case status and insurance action items (.2);	0.20	\$180.00
9/18/2023 Jesse Bair	Participate in call with Debtor insurance counsel re case insurance issues (.1);	0.10	\$90.00
9/18/2023 Alyssa Turgeon	Draft email summary to T. Burns re analysis of all Diocesan coverage correspondence (.2);	0.20	\$68.00
9/18/2023 Brian Cawley	Additional analysis re new California law re time-limited demands (.5);	0.50	\$275.00
9/18/2023 Timothy Burns	Participate in conference with J. Bair re case status and insurance action items (.2);	0.20	\$224.00

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9/18/2023 Jesse Bair	Correspondence with the Diocese re insurer Rule 26(f) conference (.1);	0.10	\$90.00
9/18/2023 Timothy Burns	Analysis re status of Diocesan insurance document productions (.1);	0.10	\$112.00
9/18/2023 Nathan Kuenzi	Review spreadsheet providing summary of all Diocesan coverage correspondence (.2);	0.20	\$110.00
9/19/2023 Jesse Bair	Review the Debtor's status conference statement (.2);	0.20	\$180.00
9/19/2023 Nathan Kuenzi	Draft email memorandum for J. Bair summarizing research results re Review and analyze Ninth Circuit and California case law re exhaustion requirements in connection with responding to the insurers' motions to dismiss (2.6);	2.60	\$1,430.00
9/19/2023 Jesse Bair	Analysis re follow-up research needed in connection with responding to the insurers' motions to dismiss (.2); provide instructions to N. Kuenzi re same (.1); preliminary analysis of N. Kuenzi research results re exhaustion issue (.2);	0.50	\$450.00
9/19/2023 Nathan Kuenzi	Review and analyze Ninth Circuit and California case law re exhaustion requirements in connection with responding to the insurers' motions to dismiss (5.0);	5.00	\$2,750.00
9/19/2023 Jesse Bair	Analyze the insurers' Rule 2004 reply brief and accompanying amended Order approving same (.5);	0.50	\$450.00
9/19/2023 Jesse Bair	Correspondence with B. Weisenberg and K. McNally re call to discuss case overview, scope of work, and insurance issues (.1);	0.10	\$90.00
9/20/2023 Jesse Bair	Prepare for call with Lowenstein team re strategy for hearing on the insurers' Rule 2004 motion (.1); participate in call with Lowenstein team re same (.4);	0.50	\$450.00
9/20/2023 Timothy Burns	Review Status Conference Statement (.2);	0.20	\$224.00
9/20/2023 Timothy Burns	Review the insurers' reply in support of their Rule 2004 motion (.2);	0.20	\$224.00
9/20/2023 Nathan Kuenzi	Continue reviewing spreadsheet providing summary of all Diocesan coverage correspondence (.4);	0.40	\$220.00
9/20/2023 Nathan Kuenzi	Prepare public insurance materials for potential valuation expert (.2);	0.20	\$110.00
9/20/2023 Timothy Burns	Participate in call with J. Bair re strategy for insurer 2004 hearing (.1);	0.10	\$112.00
9/20/2023 Jesse Bair	Correspondence with N. Kuenzi re publicly available insurance information needed by potential valuation expert (.1);	0.10	\$90.00
9/20/2023 Jesse Bair	Participate in call with T. Burns re strategy for insurer 2004 hearing (.1);	0.10	\$90.00

9/20/2023 Jesse Bair	Prepare for call with potential valuation expert (.1); participate in call with B. Weisenberg and potential valuation expert (.4);	0.50	\$450.00
9/21/2023 Jesse Bair	Participate in call with T. Burns re state court counsel meeting outcome and follow up (.1);	0.10	\$90.00
9/21/2023 Jesse Bair	Correspondence with valuation expert re public Diocesan insurance information (.1);	0.10	\$90.00
9/21/2023 Timothy Burns	Participate in call with J. Bair re state court counsel meeting outcome and follow up (.1);	0.10	\$112.00
9/22/2023 Jesse Bair	Participate in Rule 26(f) conference with the insurers (.9);	0.90	\$810.00
9/22/2023 Jesse Bair	Correspondence with the Diocese re Rule 26 conference with the carriers (.1);	0.10	\$90.00
9/22/2023 Jesse Bair	Participate in call with T. Burns re outcome of Rule 26(f) conference with the insurers (.1);	0.10	\$90.00
9/22/2023 Jesse Bair	Review the Diocese's draft Rule 26 case management statement (.1);	0.10	\$90.00
9/22/2023 Timothy Burns	Participate in call with J. Bair re outcome of Rule 26(f) conference with the insurers (.1);	0.10	\$112.00
9/24/2023 Jesse Bair	Brief review of comprehensive chart re Diocesan coverage correspondence (.2);	0.20	\$180.00
9/25/2023 Jesse Bair	Correspondence with Lowenstein re additional insurance meeting with the Diocese (.1);	0.10	\$90.00
9/25/2023 Jesse Bair	Draft outline of the Committee's response to the insurers' motions to dismiss (.5);	0.50	\$450.00
9/25/2023 Jesse Bair	Participate for insurance purposes in portion of meeting between Committee and Diocese (2.1);	2.10	\$1,890.00
9/26/2023 Jesse Bair	Answer B. Cawley questions re the Committee's response to the insurers' motions to dismiss the insurance adversary complaint (.1);	0.10	\$90.00
9/26/2023 Timothy Burns	Participate in conference with J. Bair re strategy for hearing on the insurers' Rule 2004 motion (.1);	0.10	\$112.00
9/26/2023 Brian Cawley	Begin drafting the Committee's response to the insures' motions to dismiss (6.4);	6.40	\$3,520.00
9/26/2023 Jesse Bair	Participate in call with T. Burns re strategy for upcoming hearing on the insurers' Rule 2004 hearing (.1);	0.10	\$90.00
9/26/2023 Jesse Bair	Review the insurers' status conference statement (.1);	0.10	\$90.00
9/26/2023 Brian Cawley	Review motion to dismiss materials and other filings in preparation for drafting the Committee's response to same (1.2);	1.20	\$660.00
9/26/2023 Jesse Bair	Correspondence with the Diocese re supplemental insurance call (.1);	0.10	\$90.00
9/27/2023 Brian Cawley	Continue drafting the Committee's response to the insures' motions to dismiss (5.4);	5.40	\$2,970.00

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	Totals for Insurance Adversary Proceeding	72.60	\$50,370.00
9/30/2023 Jesse Bair	Begin drafting revised version of the Committee's response to the insurers' motions to dismiss (2.0);	2.00	\$1,800.00
9/30/2023 Jesse Bair	Analyze relevant case law and related pleadings in connection with drafting revised version of the Committee's response to the insurers' motions to dismiss (.6);	0.60	\$540.00
9/29/2023 Jesse Bair	Analysis in connection with upcoming insurance presentation to the Committee (.1);	0.10	\$90.00
9/29/2023 Jesse Bair	Review correspondence with the Debtor and the insurers re protective order and Rule 2004 issues (.1);	0.10	\$90.00
9/29/2023 Jesse Bair	Participate in call with B. Weisenberg re state court counsel insurance questions (.2);	0.20	\$180.00
9/29/2023 Jesse Bair	Participate in call with state court counsel re answer to certain Diocesan insurance questions (.3);	0.30	\$270.00
9/29/2023 Jesse Bair	Participate in call with M. Kaplan and B. Weisenberg re case insurance strategy, including upcoming mediation session, Rule 2004 motion, and motion to dismiss response (.5);	0.50	\$450.00
9/28/2023 Timothy Burns	Review correspondence with the Debtor and the insurers re protective order issues (.1);	0.10	\$112.00
9/28/2023 Jesse Bair	Conference with T. Burns re hearing outcome re the insurers' 2004 motion and next-steps (.1);	0.10	\$90.00
9/28/2023 Jesse Bair	Correspondence with the Diocese re insurance call and document requests (.1);	0.10	\$90.00
9/28/2023 Timothy Burns	Review correspondence with BB and the Debtor re coverage information (.1);	0.10	\$112.00
9/28/2023 Timothy Burns	Review correspondence with Lowenstein and the Committee re Rule 2004 hearing (.1);	0.10	\$112.00
9/28/2023 Jesse Bair	Analysis re insurance question from state court counsel (.1); correspondence with B. Weisenberg re same (.1);	0.20	\$180.00
9/28/2023 Timothy Burns	Conference with J. Bair re hearing outcome re the insurers' 2004 motion and next-steps (.1);	0.10	\$112.00
9/28/2023 Jesse Bair	Review correspondence with the Diocese and the insurers re Rule 26(f) report and adversary proceeding protective order (.1);	0.10	\$90.00
9/28/2023 Jesse Bair	Correspondence with Lowenstein re potential 2004 request on the insurers (.1);	0.10	\$90.00

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### **Timekeeper Summary**

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	Paralegal	9.70	\$340.00	\$3,298.00
Brenda Horn-Edwards	Paralegal	0.50	\$340.00	\$170.00
Brian Cawley	Associate	23.00	\$550.00	\$12,650.00
Jesse Bair	Partner	32.50	\$900.00	\$29,250.00
Nathan Kuenzi	Associate	8.40	\$550.00	\$4,620.00
Timothy Burns	Partner	11.10	\$1,120.00	\$12,432.00

Total Due This Invoice: \$62,420.00

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